

-----Original Message-----

From: Berger, James [mailto:jaberger@pa.gov]

Sent: Wednesday, August 26, 2015 11:57 AM

To: Chris Cope (ccope@uppersaucon.org) <ccope@uppersaucon.org>; Karl Schreiter (kes1@aol.com) <kes1@aol.com>

Cc: Bellanca, Amy <abellanca@pa.gov>; Blanco-Gonzalez, Joel <Blanco-Gonzalez.Joel@epa.gov>

Subject: Redraft Upper Saucon NPDES Permit.

Chris and Karl:

Attached is the redraft NPDES Permit ID# PA0053147 for the Upper Saucon Township WWTP, in Upper Saucon Township, Lehigh County for your look-over and comment. EPA will also have the opportunity to provide public comments on the redraft NPDES Permit. Please submit any additional public comments within thirty days, or we may issue the permit as is.

In terms of changes from previous Draft NPDES permit and responses to received public comments:

1. Most of the new monitoring/limits dropped out due to updated Reasonable Potential Analysis (based on new sampling results, etc.). The TRE condition has been updated to drop no longer applicable constituents.

2. The DRBC requested quarterly TDS monitoring/reporting, which has been incorporated into the permit.

3. Request for clarification regarding Bypass & SSO requirements:

a. A "bypass" (defined in Part A.II, page 8) is an intentional diversion of waste streams from any portion of a treatment facility. WWTP Bypass flows have the same sampling requirements as normal flows (NPDES Permit Parts A.I.A; A.I.B) with additional "bypass" requirements set forth in Part A.I Additional Requirements Item 4, page 7; Part A.III.C (Reporting and Notification Requirements), pages 12-16; and Part B.I.G (Bypassing), pages 18 - 19. Reporting requirements are also spelled in the DEP Supplemental Forms (Non-Compliance Reporting Form and the Bypass Reporting Form) that will be issued with the Final NPDES Permit.

b. SSOs (defined in Part B.I.H (Sanitary Sewer Overflows (SSOs), page 19) are not "bypasses". An SSO is an overflow of wastewater, or other untreated discharge from a separate sanitary sewer system (which is not a combined sewer system), which results from a flow in excess of the carrying capacity of the system or from some other cause PRIOR to reaching the headworks of the sewage treatment facility. SSOs are not authorized under this permit. The permittee shall immediately report any SSO to DEP in accordance with Part A III.C.4 (page 16).

4. Request for clarification of Stormwater Sampling Requirements:

a. Permit Requirements: The Permit Part C.IV.E.4 clarifies that no Part A sampling is required when there is no available point of concentrated stormwater flows that can be sampled (whether due to sheet flow or due to infiltration into groundwater), but that the Part C.IV requirements in regard to PPC Plan, stormwater BMPs, stormwater inspections, etc. must be complied with. Should the site be modified in a way that creates a concentrated point of stormwater flow that can be sampled within the permit term, then Part A sampling would be required at that time by the Permit.

b. Sheet Flow Sampling Methods: There is EPA guidance available regarding how to sample stormwater sheet flows, if the Authority wishes to conduct such sampling.

5. Request for Clarification regarding Toxic Reduction Evaluation (TRE) Requirements: The Authority indicated concerns over the scope of the Part C.II-required TRE and whether it would produce any useful results in determining potential sources (given previous 2010 Copper TRE). See the Part C.II (TRE) language for the minimum TRE requirements. Please note that it is the permittee who determines the scope of the TRE study, but compliance with new permit limits will be required unless alternate limits can be justified via the TRE process. Additional guidance:

a. TRE Guidance: The July 30, 2011 DEP ID# 361-0100-003 "Water Quality Toxics Management Strategy" Appendix C (Permittee Guidance for Conducting a Toxics Reduction Evaluation (TRE)) is available via the DEP website.

b. Bis (2-Ethylhexyl) Pthalate: The Part C.II (TRE) conditions apply to this constituent only.

c. Copper: The Department is not requiring a new TRE for copper at this time, which is subject to monitoring requirements only. You do have the option of voluntarily expanding the required TRE for Bis (2-Ethylhexyl) Pthalate to include copper and thereby update the March 2010 TRE Phase I (copper). Please note that Water Effects Ratio (WER) Studies are only valid for ten (10) years or 2 permit terms, whichever comes first; at that time the permittee can accept the limits set through the DEP SOPs or do another WER/alternate Biotic Ligand Method (BLM) which the Department has been recommending instead of the WER.

PS. Please forward this redraft NPDES Permit to Mr. Bruce Brush (USSTA), as I did not have his e-mail address...

James Berger | Environmental Engineer
Department of Environmental Protection | Northeast Regional Office
2 Public Square | Wilkes-Barre, PA 18701-1915
Phone: 570.826.2308 | Fax: 570.830.3016
www.depweb.state.pa.us

-----Original Message-----

From: Berger, James [<mailto:jaberger@state.pa.us>]
Sent: Wednesday, August 26, 2015 11:12 AM
To: Berger, James
Subject: Message from "RNP0026735A9C26"

This E-mail was sent from "RNP0026735A9C26" (Aficio MP 5002).

Scan Date: 08.26.2015 11:12:10 (-0400)